

CAG Technical Committee Update – 2/2/16

EPA actions performed in 2015 and continuing in 2016:

1. **Phase 1D Investigation** – The PRPs under EPA oversight completed the Phase 1D fieldwork in the fall of 2015. The evaluation of validated data from this fieldwork allowed EPA to determine the extent of RIM in Operable Unit 1, which was a significant element necessary to complete the Isolation Barrier alignment determination. EPA completed our review of the draft Comprehensive Phase 1 investigation report and sent comments to PRPs on 1/28/16. **Next Action:** PRPs have until 2/11/16 to provide EPA with a revised document. Once EPA approves the document, it will be publicly released. In addition, EPA will provide extent of RIM figures that revises OU1, Area 1 boundary.
2. **Isolation Barrier (IB) Determination** – At the end of 2015, EPA announced its decision to require the installation of an Isolation Barrier, along with other engineering measures, to ensure RIM remains separated from the SSE currently occurring in the Bridgeton Landfill. EPA Region 7 made this decision with technical support from our Office of Research and Development, the US Army Corps of Engineers and in consultation with the state MDNR/DHSS throughout the fall and winter of 2015. **Next Actions:** EPA is negotiating the technical and legal details with the PRPs to perform this work pursuant to an enforceable schedule.
3. **OU1 RI/FS Administrative Order on Consent - Scope of Work (AOC-SOW) modification** - EPA negotiated and finalized a modified SOW with the PRPs on 12/9/15. The SOW modification provides EPA with an enforceable schedule that ensures all work needed to propose its final remedy decision occurs by the end of this year. **Next Actions:** Accordingly, PRPs will deliver a Remedial Investigation Addendum (RI) and subsequent Final Feasibility Study (FFS) for EPA's review and approval this fall. Once the FFS is approved, EPA will finalize our evaluation of the 2008 remedy decision and issue its draft decision for public review and comment.
4. **OU1 Surface Fire Unilateral Administrative Order (UAO) for Removal Action** – EPA OSCs responded on October 24 and 25, 2015 to a surface fire which occurred at the perimeter of the Bridgeton Landfill and coordinated with local first responders and MDNR. Activities are documented in EPA's Emergency Response Activity Report, dated December 7, 2015. EPA subsequently issued a UAO on December 9, 2015, for a time-critical removal action. The UAO requires the PRPs to: 1) implement various engineering measures to mitigate the risk of a surface fire within the boundary of the West Lake Landfill site coming in contact with RIM at or near the surface, and 2) develop an incident management plan (IMP) that will be used to coordinate with local emergency responders. **Next Actions:** PRPs provided EPA with a draft work plan and supporting documents for construction of a non-combustible cover (NCC) and framework for development of the OU1 IMP. EPA is currently reviewing these documents and anticipates work to begin on the NCC in February with completion of fieldwork by end of spring. A final report will be subsequently submitted by the PRPs for EPA review and once approved made available to the public.
5. **MDNR Field Screening Activities** - MDNR personnel, with support from EPA, performed field screening actions around the West Lake Landfill. An interim report describing these field

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activities and preliminary results from the November 4-6, 2015 Radiological Survey and Sampling has been made publicly available. The interim report identifies screening results of interest in the general area of what is referred to as the Buffer Zone. The Buffer Zone was previously identified by EPA as part of the West Lake Landfill Superfund site. The 2008 Record of Decision required further action to be taken in those locations and EPA expects to include appropriate actions for this area in its final remedy decision. Based on EPA's evaluation of all of the site related data to date, including the screening level data from the Buffer Zone provided by MDNR, the agency does not believe there is an unacceptable risk to outdoor workers in this area. EPA and the State have visited the trucking company officials and the PRPs to review this interim information. **Next Actions:** EPA will coordinate with MDNR as they prepare their final report, and we are also evaluating whether portions of the Buffer Zone will be addressed as part of the work being performed under the Surface Fire Prevention Removal Order.

6. **Surface flooding response, December 28, 2015** – EPA R7 RPM, National spill line and MDRN spill line received notice from the public of surface water discharging from the site into the drainage ditch along St. Charles Rock Road. EPA contacted MDNR personnel who responded with an OSC and coordinated with Republic Services to inspect the incident. EPA also remained in communication with MDNR throughout the response. The MDNR collected confirmation runoff samples. The responding state OSC attributed the discharge to a prolonged high precipitation event, which overloaded the Bridgeton Landfill controls resulting in a release of surface water into and across the adjacent OU1 Area 1 (southeast corner). This part of OU1 does not contain RIM. **Next Action:** EPA is developing a sampling plan and Quality Assurance Project Plan (QAPP) for collection of sediment samples within and adjacent to OU1 for analysis for radionuclides.
7. **Groundwater Investigations (new Operable Unit)** – As previously stated, EPA intends to investigate and address groundwater under a new Operable Unit (OU3). In late 2015 and January 2016, EPA had multiple discussions with the State of Missouri about future groundwater work. **Next Actions:** EPA with technical support from the US Geological Survey is developing the scope of additional groundwater investigations to fully characterize nature and extent of contamination related to the site.
8. **Pb 210 Item** – Article published in December 2015 Journal of Environmental Radioactivity, Titled "Tracking legacy radionuclides in St. Louis, Missouri, via unsupported ^{210}Pb " by M. Laltofen; et al, is under coordinated review by EPA Region 7, EPA ORD, USACE, USGS, ATSDR and MDNR/DHSS. EPA will share the results of that review once it is complete.
9. **Dialogue Framework** - After consulting with other experts we have decided to establish an independent Community Dialogue Framework where participants from across the community, key stakeholders and EPA can share perspectives on the West Lake Landfill Superfund Site.

The long-term objective is to offer a forum for communication and understanding of the various activities underway at the West Lake Landfill that will protect the public from the radiologically-impacted material located at the site.

EPA has contracted with neutral facilitator Cindy Cook of Adamant Accord to develop this forum in a collaborative way with the community.

- 10. Pyrolysis Study** - A QAPP has been approved to collect and analyze samples to test the radon emanation of RIM from West Lake Landfill, OU1, Area 1 and Area 2. A total of six samples were collected for this portion of the study and are currently being analyzed at Southwest Research Institute in San Antonio, TX. These samples will be utilized to provide up to 54 individual measurements of radon emanation at various testing parameters.